

In The United States District Court
For The Southern District Of Mississippi

Jason Holloway

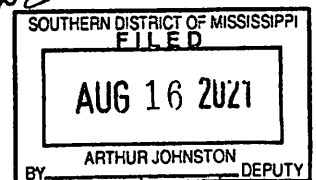
Plaintiff

vs

civil action No. 5:21-cv-63-KS-JLG

Scott Middlebrooks et al Defendants

Motion To Amend Complaint
To Add New Defendants And
To Add New Claims



Comes Now I, Jason Holloway, pro se
and files the above styled motion and am
willing to show unto the court the following:

1. This case was filed by plaintiff on 7-~~25~~-21
when the plaintiff filed the complaint he had
named Jane and John Does to whom he
couldn't identify at the time. Since the filing
of the complaint the plaintiff has been able
to identify more defendants and has exhausted
his remedies as to the new claim he now
wishes to add to this complaint.
2. The plaintiff will name the new defendants
and state how they violated his constitutional

rights,

3. The plaintiff wishes to add the following new defendants:

(A) Management + Training Corporation (M.T.C.)
500 N. Marketplace Dr. # 100
Centerville, Utah 84014

(B) Unknown Dunmore (Kitchen Supervisor)
2999 Hwy 61 North
Woodville, MS 39669

(C) Unknown D. Anthony (Chaplain)
2999 Hwy 61 North
Woodville, MS 39669

(D) George Castro (Deputy Warden)
2999 Hwy 61 North
Woodville, MS 39669

(E) William DeRevere (Deputy Warden)
2999 Hwy 61 North
Woodville, MS 39669

(F) Vital Core Health Strategies (Contract Medical Co.)

4. M.T.C. is a for profit organization and is contracted with M.D.O.C. to run 3 private prisons in MS. One of them being W.C.C.F. where the plaintiff is currently housed. M.T.C. is responsible for making sure that it properly has adequate staff to operate the prison. M.T.C. has failed to adequately staff W.C.C.F. and has failed to train, supervise, and provide adequate medical care for plaintiff by being short of staff to properly operate the facility and to get the plaintiff to scheduled medical appointments for his serious medical needs.
5. Unknown Dunmore is the kitchen supervisor at W.C.C.F. She has failed to provide the plaintiff with his ordered medical diet, that was ordered by the medical provider here at W.C.C.F.
6. Unknown D. Anthony is the Chaplain at W.C.C.F. and he has denied the plaintiff his right to practice his religion here at W.C.C.F.
7. George Castro is the Deputy Warden here at W.C.C.F. and he has failed to make sure that the plaintiff was taken to scheduled medical appointments here within the facility because of shortage of staff.

and for denying the plaintiff his right to practice his religion. And making sure MDAC policies followed

8. William DeRevere is the deputy warden at W.C.C.F. And he has failed to properly supervise the operations here at W.C.C.F. by not making sure that the plaintiff gets to scheduled medical appointments, and for denying the plaintiff his right to practice his religion, and following M.D.O.C. policies.
9. Vital Core Health Strategies is the contract medical company that is contracted with M.D.O.C. to provide medical care to the plaintiff. They have failed to properly staff the medical department, make sure that plaintiff received adequate medical care for his serious medical needs, and for the delay in being seen by medical personal for his serious medical needs.
10. The plaintiff wishes to add the following new claim to this complaint:

Denial of Religion

11. The plaintiff arrived at W.C.C.F. on 2-25-21 and during the intake at the facility the plaintiff was asked by case manager Dukes what is

religion was and the plaintiff told her Islam. The plaintiff had changed his religion in 2019 and started practicing Islam.

12. Upon arriving and being housed at W.C.C.F., the plaintiff sent out several inmate request to the Chaplain's Department advising them that he was of the Islam faith and that Ramadan was approaching and that he wished to participate in Ramadan. The plaintiff also request to the kitchen.
13. When Ramadan started the plaintiff was told that he was not on the list to participate in Ramadan. So the plaintiff still fasted as required for the month of Ramadan. During Ramadan we are required to eat before the sun comes up and not eat again until the sun goes down.
14. Since the plaintiff was not on the list to participate in Ramadan his trays were served with the other inmates in which he was unable to eat because they were delivered after the sun came up or before the sun went down. This causing the plaintiff to suffer from severe weight loss, stomach cramps from hunger, and mental and emotional distress.

15. The plaintiff was seen by the medical care provider around 6-16-21 and because of the severe weight loss the plaintiff had suffered the provider ordered a special diet for the plaintiff. That being a Nutrition Support tray to try and help the plaintiff gain some weight back.
16. The diet ordered was for nutrition support with no corn products as the plaintiff is allergic to corn products. This was also ordered for the plaintiff upon arrival at W.C.C.F. that he was not to receive corn products on his tray.
17. Since then the plaintiff has also had to miss several meals or portions thereof because of corn products being placed on his tray. This is still ongoing even after the plaintiff filed grievances about corn products being placed on his tray.
18. The plaintiff has sent several inmate request to defendant Dunmore about corn products still being placed on his tray even after he completed the ARP process and as of the date of this Amended Complaint, There is still being corn products placed on the plaintiff's tray in violation of the doctors orders. To the plaintiff's serious medical needs,

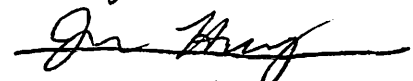
19. Since no defendants have been served nor an answer filed yet to this complaint. This motion and the new claims should be granted.

For all the reasons mentioned herein this motion should be granted and the new defendants and claims should be added to this complaint.

Respectfully Submitted
Jason Holloway
8-2-21

I, Jason Holloway do declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed this the ^{21st} ~~2nd~~ day of August, 2021


Jason Holloway

Jason Holloway # M0998
W.C.C.F. E-206
P.O. Box 1889
Woodville, MS 39669